

UNITED STATES DISTRICT COURT  
FOR THE  
DISTRICT OF MASSACHUSETTS

_____	)	
SONYA LARSON,	)	
Plaintiff	)	
	)	
v.	)	No.: 1:19-cv-10203-IT
	)	
DAWN DORLAND PERRY, et al.	)	
	)	
Defendants	)	
_____	)	

**CERTIFICATION UNDER LOCAL RULE 7.1 OF CONFERENCE WITH COUNSEL  
REGARDING PLAINTIFF’S MOTION FOR A PROTECTIVE ORDER AND  
TO EXTEND SCHEDULING ORDER DEADLINES**

I certify that on January 15, 2021, Counsel for all Parties conferred by telephone to discuss asking this Court to extend the Scheduling Order deadlines. All Parties agreed that some additional time is needed by the Parties beyond the current deadline for fact discovery of February 28, 2021. All Parties agreed to an extension of fact discovery to April 14, 2021.

Subsequent to said conference, Plaintiff’s counsel notified counsel for all Defendants on January 27, 2021, that Plaintiff was going to move the Court for a Protective Order asking for a postponement of a deposition of Plaintiff by Defendant Dorland-Perry until this Court rules on Plaintiff’s Motion to Dismiss her Counterclaim.

Counsel for all Parties exchanged several emails on the subject in an attempt to narrow or resolve their differences as to Plaintiff’s Motion for a Protective Order and to amend this Court’s latest Scheduling Order, but were unable to do so.

Respectfully submitted,  
Plaintiff,  
Sonya Larson,  
By her attorneys,

January 27, 2021

*/s Andrew D. Epstein*

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Andrew D. Epstein (#155140)  
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Certificate of Service

I certify that the within Certification Under Local Rule 7.1 of Conference with Counsel was filed through the court's ECF system and a copy was sent electronically on the day it was filed to all counsel of record.

*/s/ Andrew D. Epstein*

January 27, 2021

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Andrew D. Epstein